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Attorneys for Defendant
GABRIEL GONZALES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GABRIEL GONZALES et al,

Defendant.

Case No. 4-20-70327 MAG [DMR]

**GABRIEL GONZALES' MODIFIED *EX PARTE* APPLICATION FOR ORDER
PERMITTING TRAVEL FROM HOUSE;
[Proposed] Order**

I, Ashley Riser, declare:

1. I represent Defendant GABRIEL GONZALES in the above-entitled matter. He is currently released on an unsecured \$75,000 bond with home confinement. The purpose of this application is to request that Mr. Gonzales be allowed to visit his grandparents for Thanksgiving on November 26, 2020. He will leave the house at 11:00 AM and he will return home by 8:30 PM.
2. Mr. Gonzales' grandparents live in San Pablo, and Mr. Gonzales' mom will drive Mr. Gonzales to and from the event. When Mr. Gonzales was released from custody, the Court ordered Mr. Gonzales to live with his mom.
3. During this event, Mr. Gonzales will be under the supervision of his grandparents and/or mom at all times.
4. This event will have a limited number of people, and it will follow all social distancing and

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other COVID prevention guidelines.

5. This event will not have alcohol or narcotics because Mr. Gonzales' grandparents do not allow alcohol or narcotics into the home due to their sobriety.
6. Mr. Gonzales does not have any Pretrial Release violations.
7. A March 9, 2020 Complaint was filed alleging Mr. Gonzales' violation of 21 U.S.C. § 841(a)(1), (b)(1)(B).
8. I contacted AUSA Joseph Tartakovsky, who informed me that does not object to Mr. Gonzales' request.
9. Pretrial Services Officer Kalisi Kupu, who monitors Mr. Gonzales, informed me that she does not object to this request. Further, I provided Officer Kupu with the contact information for Mr. Gonales' grandparents and mom.
10. Based on the foregoing, I respectfully request that the conditions of Mr. Gonzales' release be modified so that he may be permitted to travel to travel to his grandparents' house on November 26, 2020. All other conditions of Mr. Gonzales' release shall remain the same. Furthermore, Mr. Gonzales shall inform his pretrial services officer of all travel-related details.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED: November 23, 2020

/s/
ASHLEY RISER
Attorney for GABRIEL GONZALES

[PROPOSED] ORDER

Based on the foregoing, and good cause appearing:

IT IS HEREBY ORDERED that the conditions of Defendant GABRIEL GONZALES' release shall be modified as follows:

Mr. Gonzales is permitted to travel to his grandparents' house on November 26, 2020 from 11:00 AM to 8:30 PM. All other terms and conditions shall remain in place.

DATED: _____

HONORABLE JUDGE DONNA M. RYU
United States Magistrate Court Judge

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